

UNITED STATES DISTRICT COURT

for the
Southern District of OhioIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)PATHOLOGY AND/OR BODY TISSUE
SAMPLES OF F [REDACTED] ABDILLE
IN THE POSSESSION OF OHIO HEALTH

Case No. 2:18-mj-768

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Southern District of Ohio
(identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before 10-25-18 (not to exceed 14 days)
☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to Any Magistrate Judge.
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of

Date and time issued: 10-11-18 @ 10:09 am

Chelsey M. Vascara

Judge's signature

City and state: Columbus, Ohio

U.S. Magistrate Judge Chelsey M. Vascara

Printed name and title

ATTACHMENT A

ITEMS TO BE SEARCHED

This warrant requests a search of any and all pathology and/or body tissue samples taken by Ohio Health and stored, maintained or controlled by their Department of Pathology, 3535 Olentangy River Road, Columbus, OH 43214, for items further described in Attachment B.

ATTACHMENT B

ITEMS TO BE SEIZED

The items to be seized are any and all pathology and/or body tissues samples taken from F█████ Abdille (deceased), DOB ██████ SSN ██████ by Ohio Health and stored, maintained or controlled by their Department of Pathology, 3535 Olentangy River Road, Columbus, OH 43214.

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address)
 PATHOLOGY AND/OR BODY TISSUE
 SAMPLES OF F [REDACTED] ABDILLE
 IN THE POSSESSION OF OHIO HEALTH

Case No. 2:18-mj-768

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

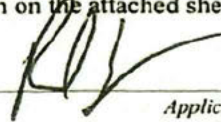
- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 1425	Knowingly procuring or attempting to procure, unlawfully, naturalization, or citizenship.

The application is based on these facts:

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

TFO Paul Kroeger, FBI Joint Terrorism Task Force

Printed name and title

Sworn to before me and signed in my presence.

Date: 10-11-18

City and state: Columbus, Ohio



Judge's signature

U.S. Magistrate Judge Chelsey M. Vascara

Printed name and title

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ATTACHMENT B

ITEMS TO BE SEIZED

The items to be seized are any and all pathology and/or body tissues samples taken from F [REDACTED] Abdille (deceased), DOB [REDACTED], SSN [REDACTED], by Ohio Health and stored, maintained or controlled by their Department of Pathology, 3535 Olentangy River Road, Columbus, OH 43214.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF
PATHOLOGY AND/OR BODY TISSUE
SAMPLES OF F [REDACTED] ABDILLE IN
THE POSSESSION OF OHIO HEALTH

Case No. 2:18-mj-768

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION UNDER RULE 41 FOR A
WARRANT TO SEARCH AND SEIZE**

I, Paul D. Kroeger, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for pathology and/or body tissue samples taken from F [REDACTED] Abdille (deceased), date of birth [REDACTED] social security number [REDACTED] maintained by Ohio Health. Based on information provided by Ohio Health, these samples are stored, maintained or controlled by their Department of Pathology, 3535 Olentangy River Road, Columbus, OH 43214. This affidavit is made in support of an application for a search warrant to require Ohio Health, as described in Attachment A, to provide the government with the pathology and/or body tissue samples from F [REDACTED] Abdille, as described in Attachment B.

2. Your Affiant is a Deputy Sheriff with the Franklin County Sheriff's Office. Your Affiant has been a Deputy Sheriff for 22 years, and has been assigned as a Task Force Officer ("TFO") for the Federal Bureau of Investigation (FBI) Joint Terrorism Task Force ("JTTF") for five years. During my current assignment at the JTTF, I have been a Case Agent and Co-Case

Agent for multiple international terrorism investigations. While assigned to the JTTF, your Affiant has received specialized training in international terrorism. Furthermore, I have received training in computer-related crimes as well as the criminal use of email, social media, and telephonic communications.

3. The statements contained herein are based on an investigation conducted by your Affiant, my experience and training as a TFO on the JTTF, and other relevant information provided to me by other TFOs and FBI Special Agents. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of your Affiant's knowledge about this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. All dates are on or about the specified date.

4. This Affidavit is being submitted for the limited purpose of demonstrating probable cause to obtain pathology and/or body tissue samples for F [REDACTED] Abdille.

PROBABLE CAUSE

5. The target of the investigation is HUSSEIN GULED ADAM (ADAM) aka Abdifatah Farah Hersi, date of birth October 15, 1978, Social Security number [REDACTED].

6. On or about March 28, 2018, United States citizen [REDACTED] was interviewed by the FBI. [REDACTED] stated that ADAM was formerly a member of al-Ittihad al-Islamia (AIAI), and that ADAM came to the United States illegally. [REDACTED] indicated that ADAM paid a family who was granted refugee status, and entered the United States with that family. According to [REDACTED],

ADAM did this to flee his past, and to gain legal entry into the United States.

7. The information provided by [REDACTED] led the FBI to interview numerous other United States citizens, and discover allegations that ADAM had previously lived in Somalia under the name of HUSSEIN GULED ADAM. The evidence indicates that ADAM then changed his name to Abdifatah Farah Hersi, in order to appear to be a member of the family who was granted refugee status to the United States. ADAM entered the United States with this family in May of 2000.

8. Section 411 of the USA PATRIOT Act (8 U.S.C. § 1182), authorized the Secretary of State to designate terrorist organizations for purposes of immigration. This authority became known as the "Terrorist Exclusion List" authority. On or about December 5, 2001, AIAI was placed on the "Terrorist Exclusion List." AIAI is an organized Islamic group whose goal was the establishment of an Islamic State. AIAI committed terrorist acts in Somalia and Ethiopia in the mid-1990s and remains on the government's Terrorist Exclusion List.

9. [REDACTED], a United States citizen was interviewed in May of 2018. [REDACTED] was asked about terrorist organizations in the Gedo region of Somalia, and mentioned the name Hussein Guled as being a member of AIAI. Based on [REDACTED]'s description of the person [REDACTED] knew to be Hussein Guled, investigators believe Hussein Guled to be ADAM. [REDACTED] knew that ADAM was a member of AIAI in the Gedo region of Somalia in the 1990's and that ADAM now lived in Columbus, Ohio. [REDACTED] was asked about the name Abdifatah Farah Hersi. [REDACTED] had never heard that name before and did not know anyone by that name. [REDACTED] lived in Somalia during the 1990's and had extensive knowledge about the region and AIAI.

10. During an interview of [REDACTED], a United States citizen, it was determined that ADAM was introduced to [REDACTED] as "Hussein Guled" shortly before he entered the United States as a refugee along with the family under the name Abdifatah Farah Hersi. According to [REDACTED], ADAM stayed around for approximately two months after arriving in the United States, and then left the family after receiving his Social Security card.

11. A review of the immigration file of ADAM revealed that he used the name Abdifatah Farah Hersi, in applying for refugee status and naturalization. The last name of Hersi matches the name of the family he entered the United States with in May of 2000. After he was naturalized on June 30, 2008, "Hersi" legally changed his name to HUSSEIN GULED ADAM, which Your Affiant submits was his name originally. Several other discrepancies were discovered when reviewing the immigration file for ADAM.

12. On or about June 30, 2008, Hussein Guled Adam (ADAM), date of birth of October 15, 1978, and social security number [REDACTED] became a naturalized United States (U.S.) citizen. Your Affiant submits that ADAM unlawfully procured U.S. citizenship under a false name, to wit Abdifatah Farah Hersi (Hersi), date of birth October 15, 1978, in violation of Title 18 U.S.C. § 1425.¹

¹ The statute of limitations for the offense is tolled by order of District Court Judge Edmund A. Sargus, Jr. on June 28, 2018, due to an international request for evidence [REDACTED]

Application for Refugee Status

13. Based on Affiant's review of immigration documents, ADAM, in order to obtain refugee status in the United States, falsely claimed immediate familial relationships to the following individuals:

- a. F [REDACTED] Abdille – date of birth [REDACTED] (claimed as mother);
- b. [REDACTED] Hersi – date of birth [REDACTED] (claimed as brother);
- c. [REDACTED] Hersi – date of birth [REDACTED] (claimed as sister); and
- d. [REDACTED] Hersi – date of birth [REDACTED] (claimed as brother).

14. On or about November 25, 1998, [REDACTED] Hersiburane (aka [REDACTED] Hersi)² completed and signed an Affidavit of Relationship, listing the following individuals as family members:

- a. F [REDACTED] Abdille – date of birth [REDACTED] (relationship listed as mother);
- b. Abdifatah Farah Hersiburane (aka ADAM) – date of birth October 15, 1978 (relationship listed as brother);
- c. [REDACTED] Hersiburane – date of birth [REDACTED] (relationship listed as sister); and
- d. [REDACTED] Hersiburane – date of birth [REDACTED] (relationship listed as brother).

15. On or about September 21, 1999, ADAM completed and signed U.S. Department of Justice (USDOJ) Immigration and Naturalization Service (INS) Form I-590, Registration for Classification as Refugee, stating the following:

- a. his name was Abdifatah Farah Hersi;
- b. his date of birth was October 15, 1978; and

² Abdulhamid Farah Hersiburane entered the United States prior to November of 1998.

c. that he had no children.

16. On or about the same date, September 21, 1999, F [REDACTED] Abdille completed and signed U.S. Department of Justice (USDOJ) Immigration and Naturalization Service (INS) Form I-590, Registration for Classification as Refugee, listing the following as her children:

- a. [REDACTED] Hersi – date of birth [REDACTED];
- b. Abdifatah Farah Hersi – date of birth October 15, 1978;
- c. [REDACTED] Hersi – date of birth [REDACTED]; and
- d. [REDACTED] Hersi – date of birth [REDACTED]

17. On or about September 22, 1999, ADAM, using the false identity of Hersi stated the following to a Joint Voluntary Agency/Kenya Caseworker:

- a. he was born in Mogadishu, Somali in 1978; and
- b. that he was single with no children.

18. On or about January 14, 2000, ADAM swore to the truth of the information he provided in Form I-590 to a U.S. Immigration Officer in Nairobi, Kenya.

19. On or about May 23, 2000, ADAM fraudulently entered the U.S. as a refugee under the false identity of Hersi, with F [REDACTED] Abdille, [REDACTED] Hersi and [REDACTED] Hersi.

Application for Permanent Residence Status

20. On or about July 18, 2001, ADAM completed and signed USDOJ INS Form I-485, Application to Register Permanent Residence or Adjust Status, under the false identity Hersi, stating the following:

- a. his name was Abdifatah F. Hersi;

- b. his date of birth was October 15, 1978;
- c. his mother's name was F [REDACTED];
- d. that he had no sons or daughters; and
- e. that he had no present or past memberships in or affiliations with any political organizations, associations, funds, foundations, parties, clubs, societies, or similar groups in the U.S. or in other places since his 16th birthday.

21. On or about August 2, 2001, ADAM completed and signed USDOJ INS Form G-325, Biographic Information, under the false identity Hersi, listing P.O. Box 71587, Nairobi, Kenya, as his residence from July 1997 through May 2000 on the G-325. This is the same address listed for "Hussein Guled" on a letter from the U.S. DOJ INS conditionally approving the refugee status of Hersi and the family with whom he entered on January 14, 2000.

22. On or about February 21, 2002, ADAM's I-485 was approved, granting him legal permanent resident status in the United States.

Application for Naturalization

23. On or about March 23, 2005, ADAM completed and signed USDOJ INS Form N-400, Application for Naturalization, under a false identity, stating the following:

- a. his name was Abdifatah Farah Hersi;
- b. his date of birth was October 15, 1978;
- c. an email [REDACTED]@hotmail.com;
- d. that he had no sons or daughters;
- e. that he had never been a member of or associated with any organization, association, fund, foundation, party, club, society, or similar group in the U.S. or any other place;
- f. that he had never given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal; and
- g. that he had never lied to any U.S. government official to gain entry or

admission into the United States.

24. On or about June 19, 2006, ADAM swore and certified under penalty of perjury under the laws of the United States of America that the information in his application for naturalization was true and correct to a U.S. Immigration Officer.

25. On or about December 8, 2006, ADAM, using the false identity Hersi obtained a Uganda Muslim Supreme Council Certificate of Marriage purporting to establish his marriage to [REDACTED] Warsame, age 32 years, on December 6, 2006.

26. On or about April 10, 2007, ADAM, using the false identity Hersi, completed an Affidavit of Relationship for his wife, [REDACTED] Warsame, date of birth [REDACTED], date of marriage December 8, 2006.³ ADAM did not list any children on the affidavit as required by the language contained within the document. ADAM did list the following immediate family members:

- a. [REDACTED] Abdille – date of birth [REDACTED] (relationship listed as mother);
- b. [REDACTED] d [REDACTED] Hersi – date of birth [REDACTED] (relationship listed as brother);
- c. [REDACTED] n Hersi – date of birth [REDACTED] (relationship listed as sister); and
- d. [REDACTED] n Hersi – date of birth [REDACTED] (relationship listed as brother).

27. On or about June 16, 2008, ADAM again swore and certified under penalty of perjury under the laws of the United States of America that the information in his application for

³ Affiant is unclear as to why this date is different than what is listed on the Certificate of Marriage.

naturalization was true and correct to a U.S. Immigration Officer. On his N-400, ADAM indicated he wanted to legally change his name to HUSSEIN GULED ADAM.

28. On or about June 30, 2008, ADAM completed and signed U.S. Department of Justice (USDOJ) Immigration and Naturalization Service (INS) Form N-445, Notice of Naturalization Oath Ceremony, under a false identity, stating the following:

- a. his name as Abdifatah; and
- b. that he had not given any false testimony to obtain immigration benefits.

Petitions for ADAM's Sons

29. On or about October 15, 2014, ADAM submitted I-130s, Petitions for Alien Relatives for his sons [REDACTED], date of birth [REDACTED], and [REDACTED], date of birth [REDACTED]. Importantly, ADAM did not list these children on any of his prior immigration documents or applications, even though their births pre-date his entry into the U.S. as a refugee; rather, as noted above, he falsely represented that he had no children. On the I-130s, ADAM listed his date and place of present marriage as December 6, 2006, Kampala, Uganda and submitted a copy of his Certificate of Marriage with [REDACTED] Warsame.

30. On or about May 28, 2015, the I-130s ADAM filed for his sons [REDACTED] and [REDACTED] were approved.

31. On or about March 31, 2017, DNA Test Reports document the probability of paternity between ADAM and each of the sons, [REDACTED] is 99.999998%.

32. Based on Affiant's experience and knowledge of Somali culture and family

lineage, children are given a unique name and then take their father's first name followed by their paternal grandfather's first name, i.e. Hussein Guled Adam's biological children would be named as follows: "unique name," Hussein Guled. If Hersi had been ADAM's true name, his biological children would have been named [REDACTED] Abdifatah Farah and [REDACTED] Abdifatah Farah. Instead, their names are [REDACTED] Hussein Guled and [REDACTED] Hussein Guled. (Emphasis added). Also, it follows that ADAM's father's first name would be Hussein and his grandfather's first name would be Guled.

33. On or about December 27, 2017, [REDACTED] entered the U.S. as a legal permanent resident. To date, [REDACTED] visa application to enter the U.S. is still pending.

Other False Identity Evidence

34. A search of Facebook, a social networking website, at www.facebook.com for the name "Hussein Guled Adam" resulted in the identification of two Facebook accounts using the vanity name "Hussein Guled Adam," which the Affiant believes are used by ADAM. The first account is a public figure page uniquely identified by the URL www.facebook.com/hussein.g.adam and Facebook identification number 941397812565274. Your Affiant knows this page is used by ADAM based on ADAM identifying this page in a March 2018 interview with the FBI. The second account is a personal page uniquely identified by the URL www.facebook.com/hussein.g.adam.9 and Facebook identification number 100002010478304. Your Affiant believes this page is used by ADAM due to the use of the vanity name of Hussein Guled Adam, the listing of Masjid Attaqwa Community Center, where

ADAM works, and numerous photographs posted that resemble ADAM.

35. On or about April 28, 2017, ADAM posted a photo that bears a strong resemblance to him on his personal Facebook page as identified above. Next to the photo, ADAM wrote a poem about a goal he had 30 years ago, but has not yet realized, and joked about having more hair in the photo. Based on the date of birth ADAM has claimed since he applied for U.S. immigration benefits until present, October 15, 1978, he would have been approximately 9 years old at the time. The person in the photo, however, has facial hair, including a mustache and beard, suggesting that the person was significantly older.

36. On or about December 19, 2017, ADAM posted a Somali Police Force logo on his personal Facebook page as identified above. Next to the Somali Police Force logo, ADAM wrote that he joined the Somali Police Training Academy in 1983. Based on the date of birth ADAM has claimed since he applied for U.S. immigration benefits until present, October 15, 1978, he would have been approximately 5 years old at the time. He further writes that he worked for Mogadishu Criminal Investigations and The Shantaraale Police Station, among other entities.

37. As a last example, on or about July 27, 2018, search warrant returns for ADAM's personal Facebook page as identified above were received from Facebook. A review of the Facebook returns revealed private messages from October 29, 2016, in which ADAM lists his family members, including himself as the third youngest in the family, as follows:

- [REDACTED] Guled,
- [REDACTED] Guled
- [REDACTED] Guled

- [REDACTED] Guled
- [REDACTED] Guled
- [REDACTED] Guled
- [REDACTED] Guled
- [REDACTED] Guled and
- [REDACTED] Guled.

38. Based on the foregoing, Your Affiant believes there is probable cause that ADAM unlawfully procured U.S. citizenship under a false identity, to wit Abdifatah Farah Hersi. The evidence indicates that ADAM's true name is Hussein Guled Adam, and that the date of birth provided to U.S. immigration is false. Your Affiant submits that ADAM used a fake date of birth suggesting a younger age to aid in the process of coming over as a "son" in a refugee family, but that his own admissions and identifications of photographs on Facebook reveal that he is actually much older. Moreover, several people interviewed indicated that ADAM was known to them only as Hussein Guled Adam, that they were unaware of him being known by the name Abdifatah Farah Hersi, and that he entered the U.S. under a false identity. ADAM also failed to disclose his affiliation with AIAI and the Somali Police Force on his N-400, Application for Naturalization, as required. This information would have been material to determine his true identity. Finally, ADAM's biological children, as established by DNA, were born prior to his entry into the U.S. under the name Abdifatah Farah Hersi, but they do not carry that name as is customary in Somali culture and family lineage. Instead, they carry his true name of Hussein Guled. Due to these facts, there is probable cause to believe ADAM unlawfully procured U.S. citizenship in violation of 18 U.S.C. § 1425 (knowingly procuring or attempting to procure, unlawfully, naturalization, or citizenship).

39. Based on consultation with an FBI Biologist/Forensic Examiner, familial DNA analysis can provide likelihood and/or the exclusion of parental and sibling relationships. DNA samples could not be taken from F [REDACTED] Abdille to establish maternal relationship due to her death on [REDACTED]. DNA samples were collected from ADAM, [REDACTED] Hersi, [REDACTED] Hersi, and [REDACTED] d [REDACTED] Hersiburane to establish sibling relationships. Further investigation revealed that pathology and/or body tissue samples were taken from F [REDACTED] Abdille by Ohio Health prior to her death, and those samples were preserved and are currently being stored, maintained, or controlled by the Department of Pathology. Based on consultation with an FBI Biologist/Forensic Examiner, pathology and/or body tissue samples can be processed for DNA and analyzed for familial relationships. Parental relationships typically provide more conclusive results than siblings. Your Affiant believes analysis of DNA collection samples from ADAM, F [REDACTED] Abdille, [REDACTED] Hersi, [REDACTED] Hersi, and [REDACTED] d [REDACTED] Hersiburane, would exclude ADAM as an immediate family member of the refugee family he claimed when he entered the United States.

CONCLUSION

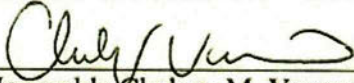
40. Based on the facts set forth in this Affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 1425 (procuring or obtaining, unlawfully, naturalization or citizenship) has been committed by HUSSEIN GULED ADAM aka Abdifatah Farah Hersi. In addition, there is probable cause to believe that evidence of this offense, as described in Attachment B, will be found within Ohio Health pathology and/or body tissue samples taken from Fatima Mire Abdille. Therefore, the Affiant requests the proposed search warrant.

Respectfully submitted,



Paul D Kroeger
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me on:



Honorable Chelsey M. Vascara
U.S. Magistrate Judge
Southern District of Ohio

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